

ORIGINAL

OPEN MEETING AGENDA ITEM



0000141810

INTERVENTION

Timothy M. Hogan (004567)
ARIZONA CENTER FOR LAW
IN THE PUBLIC INTEREST
202 E. McDowell Rd., Suite 153
Phoenix, Arizona 85004
(602) 258-8850

Attorneys for Western Resource Advocates

RECEIVED

Arizona Corporation Commission

2013 JAN 28 P 3:58

DOCKETED

JAN 28 2013

AZ CORP COMMISSION
DOCKET CONTROL

DOCKETED BY

LM

BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP, Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

IN THE MATTER OF ARIZONA PUBLIC
SERVICE COMPANY REQUEST FOR
APPROVAL OF UPDATED GREEN
POWER RATE SCHEDULE GPS-1, GPS-2,
AND GPS-3.

Docket No. E-01345A-10-0394

Docket No. E-01345A-12-0290

**PETITION FOR LEAVE TO
INTERVENE OF WESTERN
RESOURCE ADVOCATES**

IN THE MATTER OF THE APPLICATION
OF ARIZONA PUBLIC SERVICE
COMPANY FOR APPROVAL OF ITS 2013
RENEWABLE ENERGY STANDARD
IMPLEMENTATION FOR RESET OF
RENEWABLE ENERGY ADJUSTOR.

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation
Commission (Commission), Western Resource Advocates (WRA) hereby moves to
intervene in the above-captioned docket and, in support thereof, states as follows:

1 1. In its Open Meeting on January 23, 2013, the Commission directed the
2 Hearing Division to conduct a hearing on several matters concerning the Renewable
3 Energy Standard including the treatment of renewable energy credits.

4 2. WRA is a regional environmental law and policy center serving the Rocky
5 Mountain and Desert Southwest states. WRA has been involved in proceedings before
6 the Commission since 1990 and has been granted intervenor status in numerous dockets.

7 3. WRA's Energy Program promotes policies and programs designed to
8 encourage the development of clean energy power production technologies, energy
9 efficiency, renewable resources, distributed generation, and other measures that help
10 reduce the environmental impacts of meeting the demand for energy services, while
11 minimizing the costs and risks to ratepayers of fuel price volatility and environmental
12 regulatory requirements. WRA was an active participant in the docket leading to the
13 adoption of the Renewable Energy Standard and Tariff rules and has submitted comments
14 in the current docket.
15

16 4. WRA plans to participate in the hearing ordered in this docket by the
17 Commission at its Open Meeting on January 23, 2013.
18

19 5. Intervention by WRA will not unduly broaden the issues or delay the
20 proceeding. WRA does not yet know what position it will take in this proceeding.
21

22 6. WRA requests that all pleadings, correspondence, discovery, and other
23 documents be served on the following:
24
25

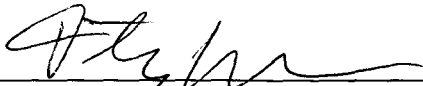
1 Timothy M. Hogan
2 Arizona Center for Law in the Public Interest
3 202 E. McDowell Road, Suite 153
4 Phoenix, AZ 85004
5 (602) 258-8850
6 fax (602) 258-8757
7 thogan@aclpi.org

8 David Berry
9 Western Resource Advocates
10 P.O. Box 1064
11 Scottsdale, AZ 85252-1064
12 (480) 990-7209 (fax is the same)
13 david.berry@westernresources.org

14 Wherefore, WRA respectfully requests that the Commission issue an order
15 granting its Motion to Intervene in the above-captioned proceeding.

16 DATED this 28th day of January, 2013

17 ARIZONA CENTER FOR LAW IN
18 THE PUBLIC INTEREST

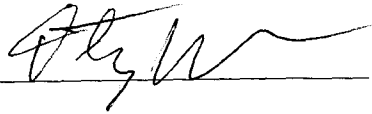
19 By 
20 Timothy M. Hogan
21 202 E. McDowell Rd., Suite 153
22 Phoenix, Arizona 85004
23 Western Resource Advocates

24 ORIGINAL and 13 COPIES of
25 the foregoing filed this 28th day
of January, 2013, with:

26 Docketing Supervisor
27 Docket Control
28 Arizona Corporation Commission
29 1200 W. Washington
30 Phoenix, AZ 85007

1 COPIES of the foregoing
2 Electronically mailed this
3 28th day of January, 2013, to:

4 All Parties of Record

5 
6